



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 6, 2011

Mr. Matt Armstrong  
Williams Northwest Pipeline GP  
P.O. Box 58900  
Salt Lake City, UT 84158-0900

Dear Mr. Armstrong:

**NWP Sumas Station Request for Administrative Changes to PSD-01-08 Amendment 3 Permit**

Ecology reviewed Williams Northwest Pipeline's (NWP) letter dated May 18, 2011, requesting clarification and simplification of CO monitoring conditions in PSD-01-08 Amendment 3, related to the use of portable CO monitors in preparation for renewal of the site's Title V permit. Ecology notes that the testing conditions that determine CO compliance in Approval Condition 5.4 are not requested to be changed. No physical changes are requested either.

Ecology agrees that using the portable analyzers to measure CO volume percent in the turbine exhaust gas is an adequate indicator of compliance, and the additional calculation of CO mass flow is not required. Repeated testing has shown that when the volume percent measurement is in compliance, the mass emissions will also calculate to be in compliance. The words "and 5.2" are removed throughout Approval Condition 5.5 to accomplish this change.

Condition 5.5.1.3 currently requires that if three consecutive tests for CO volume percent indicate a CO concentration that is out of compliance, further testing for three hours be done (to eliminate the possibility of a false positive test and to indicate compliance status with the CO permit limit's 3-hour averaging time). If an exceedance or high reading persists, the unit should then be shut down as soon as practical and the cause of the problem reading found and repaired. Williams requested that the delay in shutdown requirement be eliminated, and repairs be allowed to begin as soon as a problem is indicated. To facilitate this, NWP suggested reducing the CO permit limits averaging time from three hours to one hour. Since this is more stringent than the existing condition, Ecology and NWCAA agreed. The delay for additional testing is therefore removed from Approval Condition 5.5.1.3, and averaging time reduced in Conditions 5.1 and 5.2.

NWP requested that Condition 6 language be removed. When portable CO analyzers were introduced in Amendment 1 to replace a poorly performing Predictive Emissions Monitoring System (PEMS), extra quality assurance beyond that in the test method itself (EPA CTM-034) was required in Approval Condition 6. Also, because of the low concentrations of pollutants

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being measured, NPS has requested and NWCAA agreed to several necessary modifications of the CTM-034 method's quality assurance specifications. Ecology and NWCAA feel that the additional quality assurance provided by Condition 6 is still necessary and prefer to retain it, so Condition 6 is not removed in Amendment 4.

Ecology has determined that Amendment 4 is an administrative PSD amendment. WAC 173-400-750(3)(c) and (d) allow PSD permit revisions to be considered administrative if they "... do not reduce the permittee's or ecology's ability to determine compliance with the emission limitations," and "... do not reduce the stringency of the emission limitations in the PSD permit or the ability of ecology, the permitting authority, EPA, or the public to determine compliance with the approval conditions in the PSD permit." EPA's guidance document permmod.pdf says that a permit change is administrative if it "... involves no increase in either emissions or impacts and no fundamental change in either the source or one of the emission units at that source. Application or permit revisions may be necessary, but additional review or analysis would not normally be required ...." Amendment 4 does not change the frequency of testing required, change the test methods used, or allow any change that would require additional review or analysis. It is more stringent because it shortened the CO permit limit's averaging time from three hours to one hour. Ecology has determined that Amendment 4 fits both the state and federal guidance defining an administrative amendment.

Administrative amendments do not require public notice, so there will be no public notice period for this amendment.

If you have any questions, please contact me at (360) 407-6812 or robert.burmark@ecy.wa.gov.

Sincerely,



Robert C. Burmark, PE  
Environmental Engineer

rcb/te

Enclosure

cc: Christos Christoforou, NWCAA  
Rick Graw, USFS  
Bryan Holtrop, EPA R10 (by e-mail)  
Dee Morse, NPS  
Pat Nair, EPA R10 (by e-mail)  
David Ogulei, Ecology